

Mt. Pleasant, SC 29464 o. 843.216.9000 f. 843.216.9450

> Joseph F. Rice Licensed in DC, SC direct: 843.216.9159 jrice@motleyrice.com

"I will stand for my client's rights. I am a trial lawyer." -Ron Motley (1944-2013)

October 27, 2014

VIA ECF

The Honorable Jesse M. Furman United States District Court for the Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, N.Y. 10007

Re: City of Providence et al. v. BATS Global Markets, Inc. et al., Civil Action No. 1:14-cv-02811-JMF (Consolidated)

Dear Judge Furman:

We write on behalf of Plaintiffs and Co-Lead Counsel in the above-referenced consolidated action (the "Action") in response to a request from chambers last week asking Plaintiffs to identify which parties originally named in the Action's member cases, specifically, (1) 1:14-cv-03133-JMF, (2) 1:14-cv-03608-JMF, and (3) 1:14-cv-04321-JMF, were subsequently omitted from Plaintiffs' Consolidated Amended Complaint, filed September 3, 2014 (Dkt. No. 226). Consistent with the Court's request, below please find a list of those omitted parties:

- 1. American European Insurance Company
- 2. Harel Insurance Co. Ltd.
- 3. James J. Flynn
- Dominic A. Morelli
- 5. Box Options Exchange LLC
- 6. Chicago Board Options Exchange Inc.
- 7. C2 Options Exchange Inc.
- 8. International Securities Exchange Holdings Inc.
- 9. NASDAQ OMX PHLX LLC
- 10. National Stock Exchange Inc.
- 11. OneChicago LLC
- 12. Bank of America Corporation
- 13. Citigroup Inc.
- 14. Credit Suisse Group AG



The Honorable Jesse M. Furman United States District Court for the Southern District of New York October 27, 2014 Page 2

- 15. Deutsche Bank AG
- 16. The Goldman Sachs Group Inc.
- 17. JPMorgan Chase & Co.
- 18. Morgan Stanley & Co. LLC
- 19. UBS AG
- 20. The Charles Schwab Corporation
- 21. E*Trade Financial Corporation
- 22. FMR LLC
- 23. Fidelity Brokerage Services LLC
- 24. Scottrade Financial Services Inc.
- 25. TD Ameritrade Holding Corporation
- 26. Citadel LLC
- 27. DRW Holdings LLC
- 28. GTS Securities LLC
- 29. Hudson River Trading LLC
- 30. Jump Trading LLC
- 31. KCG Holdings Inc.
- 32. Quantlab Financial LLC
- 33. Tower Research Capital LLC
- 34. Tradebot Systems Inc.
- 35. Tradeworx Inc.
- 36. Virtu Financial Inc.
- 37. Chopper Trading LLC
- 38. Wedbush Securities Inc.
- 39. Bids Trading L.P.



The Honorable Jesse M. Furman United States District Court for the Southern District of New York October 27, 2014 Page 3

Plaintiffs, of course, reserve their rights to add or join one or more of these parties to the Action in the future. I will gladly make myself available should Your Honor require additional information.

Respectfully submitted,

By: /s/Joseph F. Rice Joseph F. Rice MOTLEY RICE LLC 28 Bridgeside Blvd. Mount Pleasant, SC 29464 Telephone: 843/216-9000 843/216-9450 (fax) jrice@motleyrice.com

By: /s/ Patrick J. Coughlin (with permission)

Patrick J. Coughlin

ROBBINS GELLER RUDMAN & DOWD LLP

30 Vesey Street, Suite 200 New York, NY 10007 Telephone: 212/693-1058 619/231-7423 (fax) patc@rgrdlaw.com

By: /s/ Joel H. Bernstein (with permission)

Joel H. Bernstein

LABATON SUCHAROW LLP

140 Broadway New York, NY 10005 Telephone: 212/907-0700 212/818-0477 (fax) jbernstein@labaton.com

Co-Lead Counsel for Plaintiffs

cc: All Counsel of Record (by ECF)